

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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SUPERB MOTORS INC., TEAM AUTO SALES LLC, ROBERT ANTHONY URRUTIA, 189 SUNRISE HWY AUTO LLC, NORTHSHERE MOTOR LEASING, LLC, BRIAN CHABRIER, *individually and derivatively as a member of* NORTHSHERE MOTOR LEASING, LLC, JOSHUA AARONSON, *individually and derivatively as a member of* 189 SUNRISE HWY AUTO, LLC, JORY BARON, 1581 HYLAN BLVD AUTO LLC, 1580 HYLAN BLVD AUTO LLC, 1591 HYLAN BLVD AUTO LLC, 1632 HYLAN BLVD AUTO LLC, 1239 HYLAN BLVD AUTO LLC, 2519 HYLAN BLVD AUTO LLC, 76 FISK STREET REALTY LLC, 446 ROUTE 23 AUTO LLC and ISLAND AUTO MANAGEMENT, LLC,

Case No.: 2:23-cv-6188 (JMW)

**DECLARATION OF  
JOHN A. LENTINELLO**

Plaintiffs,

-against-

ANTHONY DEO, SARAH DEO, HARRY THOMASSON, DWIGHT BLANKENSHIP, MARC MERCKLING, MICHAEL LAURIE, THOMAS JONES, CPA, CAR BUYERS NYC INC., GOLD COAST CARS OF SYOSSET LLC, GOLD COAST CARS OF SUNRISE LLC, GOLD COAST MOTORS AUTOMOTIVE GROUP LLC, GOLD COAST MOTORS OF LIC LLC, GOLD COAST MOTORS OF ROSLYN LLC, GOLD COAST MOTORS OF SMITHTOWN LLC, UEA PREMIER MOTORS CORP., DLA CAPITAL PARTNERS INC., JONES, LITTLE & CO., CPA'S LLP, FLUSHING BANK, LIBERTAS FUNDING LLC, and JP MORGAN CHASER BANK, N.A.,

Defendants.

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I, **JOHN A. LENTINELLO**, declare under penalty of perjury:

1. I am a partner of Milber Makris Plousadis & Seiden, LLP, attorneys for defendants Thomas Jones, CPA and Jones, Little & Co., CPA's, LLP (together, "JLC").
2. I submit this Declaration in support of JLC's motion for an Order, pursuant to Fed. Rs. Civ. P. 12(b)(1), (6) dismissing Plaintiffs' Amended Complaint and all causes of action against

JLC purportedly pleaded therein against JLC, and any other claims or crossclaims that were or could have been brought as against JLC with prejudice.

3. Annexed as **Exhibit “A”** is a true and accurate copy of plaintiffs’ First Amended Complaint (Docket #65).

4. Annexed as **Exhibit “B”** is a true and accurate of JLC’s Notice of Appearance.

5. Annexed as **Exhibit “C”** is a true and accurate copy of JLC’s pre-motion letter seeking permission to move to dismiss pursuant to Fed R. Civ. P. 12(b)(1) and (6).

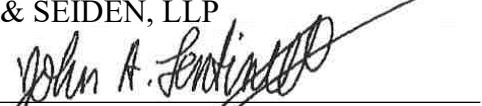
6. Annexed as **Exhibit “D”** is a true and accurate copy of U.S.M.J. James M. Wicks’ Order granting permission for JLC’s instant motion pursuant to Fed. R. Civ. P. 12(b)(1), (6). Thus, JLC’s instant motion is timely filed and filed in accordance with requisite Court permission.

7. Annexed as **Exhibit “E”** is a true and accurate copy of the Declaration of Thomas Jones, CPA of JLC, sworn to on February 6, 2024, with attached exhibits.

8. For the reasons set forth in JLC’s accompanying Memorandum of Law in Support, JLC’s instant motion should be granted in its entirety.

**I DECLARE UNDER PENALTY OF PERJURY THAT THE FOREGOING IS TRUE AND CORRECT.**

Dated: Woodbury, New York  
February 9, 2024

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& SEIDEN, LLP  
  
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TO: **ALL PARTIES VIA EMAIL**